

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS
LIABILITY LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

Guillory v. Zhejiang Huahai Pharmaceutical Co., Ltd., et al.

Case No. 1:19-cv-10044

NOTICE OF VIDEOTAPED DEPOSITION OF
MICHAEL L. BROUSSARD, MD

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 – document 632), Plaintiff (Estate of) Maxine Guillory will take the deposition upon oral examination of Michael L. Broussard, MD on **October 29, 2021 at 11:00 am CST**, and continuing until completion, via remote deposition while the witness is at his home or office or other location agreed to by the parties. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The court reporter and

videographer will be an employee or agent of Golkow Global Litigation Services. The attorney contact for the deposition is:

Sara T. Papantonio
LEVIN, PAPANTONIO, RAFFERTY,
PROCTOR, BUCHANAN, O'BRIEN,
BARR & MOUGEY, P.A.
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Dated: September 24, 2021

Respectfully submitted:

/s/Sara T. Papantonio
Sara T. Papantonio
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of September, 2021, I caused a true and correct copy of the foregoing Notice of Videotaped Deposition of Michael L. Broussard, MD to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was served on the following Defendants' counsel by e-mail:

Alyson Walker Lotman (via email, for distribution to Defendants' Counsel)

Golkow Global Litigation Services (via email)

/s/Sara T. Papantonio

Sara T. Papantonio

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